

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-17430-elf
Sharonn E. Thomas	: Chapter 13
Debtor	:
	:
U.S. Bank, National Association, as Trustee	:
for the Structured Asset Investment Loan Trust	:
Mortgage Pass-Through Certificates, Series	:
2005-8 c/o Select Portfolio Servicing, Inc.	:
Movant	:
vs.	:
	:
Sharonn E. Thomas	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

OBJECTION TO CONFIRMATION OF THE PLAN

Movant, U.S. Bank, National Association, as Trustee for the Structured Asset Investment Loan Trust Mortgage Pass-Through Certificates, Series 2005-8 c/o Select Portfolio Servicing, Inc. (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Sharonn E. Thomas (“Debtor”), as follows:

1. As of the bankruptcy filing date of November 8, 2018, Movant holds a secured Claim against the Debtor’s property located at 2832 N Bambrey St, Philadelphia, PA 19132.
2. Movant is in the process of filing a Proof of Claim by the bar date.
3. The proposed Plan indicates the Debtor is attempting to obtain a Loan Modification. Movant is not opposed to Debtor completing the required paperwork and submitting financials for review for a Loan Modification, however, Movant should be paid its arrearages through the Plan at this time, if and until a loan modification placing all arrears into such a loan modification is approved.
4. The proposed Plan also does not list a deadline for the Loan Modification to be completed by. A deadline is needed especially considering the fact that Debtor has not submitted the required paperwork to instigate the loss mitigation process.
5. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
6. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

7. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 12/18/2018

s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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and	:
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Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for U.S. Bank, National Association, as Trustee for the Structured Asset Investment Loan Trust Mortgage Pass-Through Certificates, Series 2005-8 c/o Select Portfolio Servicing, Inc. ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on **12/18/2018**:

Joshua Louis Thomas, Esquire
Via ECF
Attorney for Debtors

William C. Miller, Esquire
Via ECF
Trustee

Sharonn E. Thomas
856 North 29th St.
Philadelphia, PA 19130
Via First Class Mail
Debtors

Date: 12/18/2018

Respectfully Submitted,
s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Attorney I.D. # 81747
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